

Connecticut's P20 WIN Data Governance Manual

This manual provides a detailed description of the structure, processes, roles and responsibilities that guide the governance of P20 WIN.

Prepared by
P20 WIN Data Governance Board
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CREDIT

This manual borrows generously from the examples and best practices provided by: the National Center for Educational Statistics (NCES) State Support Team Templates, the State of Virginia “Virginia Book of Data Governance” and the Virginia “Restricted Use Data Agreement” and the State of Florida Department of Education “Unit Record Data Request Packet.”

1.0 INTRODUCTION

1.1 Purpose

This Data Governance Manual is a living document that details the structure, processes, roles and responsibilities that guide the governance of the Preschool through 20 and Workforce Information Network (P20 WIN). As a living document, this document is intended to be dynamic and incorporate changes and modifications as necessitated by changing agency and state priorities.

This manual includes and expands on the P20 WIN Data Governance Policy, which defines a framework for decision making and accountability for how data will be managed across organizations participating in P20 WIN and which empowers the P20 WIN Data Governing Board to develop more detailed standards and processes for data management. If a new policy is created or an existing policy is updated, this Manual will include a copy of the language in that policy for reference.

State agencies and organizations that share data through P20 WIN are considered Participating Agencies in P20 WIN and are accountable to the processes as defined herein; however this is not a legal document. This manual is to be used as a roadmap when making decisions concerning the collection, integration, and use of P20 WIN, and it will be consistently evaluated for effectiveness and modified as policy and data needs change within the state.

1.2 Vision & Overview of P20 WIN Documents

The Vision for P20 WIN is to inform sound educational policies and effective program practices through secure sharing of critical longitudinal data across state agencies to ensure that individuals successfully navigate educational pathways into the workforce.

While state agencies have shared data in the past for research or reporting purposes, the process of doing so without an established system has been cumbersome and hasn't allowed for linkage between more than two parties at a time. Connecticut developed P20 WIN so that multiple data sets could be linked securely and simultaneously to create longitudinal views of student experiences that had not been possible previously.

With the integration of data from multiple sources comes a responsibility to establish overarching standards for the management of that data. Data governance is both the process and the structure that enables the creation of and adherence to these data standards, and this Data Governance Manual documents the structure and processes for P20 WIN data governance.

In order to successfully coordinate secure and authorized access to data through P20 WIN within state and federal legal requirements several documents in addition to this Data Governance Manual have been developed and approved by participants to the system.

- Each participating agency has established a **Memorandum of Agreement (MOA)** between itself and The Connecticut Department of Labor, which conducts the matching process for the system.

These MOA address the requirements for written agreements as defined by the Family Educational Rights and Privacy Act (FERPA) and State law governing the use of wage records.

- The chief executive for each participating agency has signed a **Data Governance Policy** which establishes their agency's representation in the three data governing bodies, the Executive Board, Data Governing Board, Data Steward Committee – as further described in this Data Governance Manual. The Data Governance Policy authorizes the Data Governing Board to develop additional policies and procedures such as the Data Request Management Document and this Data Governance Manual.
- A **Data Request Management Procedure** has been defined by the Data Governing Board to guide the process of secure and authorized access to joined data. Embedded in this procedure are forms to facilitate record-keeping and tracking of decisions pertaining to each data request. It also includes a template MOA that is to be completed for each Data Request.

There are several driving forces in P20 WIN policies and this Data Governance Manual. The primary force is the need to link data to address policy questions that would otherwise remain unanswered but that are necessary to improve education and workforce outcomes in Connecticut. Secondly, the importance of data security and the protection of individual privacy are paramount, so protections are infused into the processes as defined by this manual and descriptions of topics such as user roles, system access and approval processes. Lastly, P20 WIN is designed with the flexibility to include additional data points and data sets; therefore, processes are included allow for these additional connections.

2.0 P20 WIN RESEARCH AGENDA

P20 WIN is a unique state resource for addressing critical policy issues that require data from more than one agency; therefore, data requests to P20 WIN will be approved only if they require input from more than one participating agency. Requests should also align with either a participating agency's individual research agenda or the P20 WIN Research Agenda as defined here. Researchers interested in requesting data from P20 WIN must remember that data requests utilizing education data are only allowed if the purpose of the request is to audit or evaluate Federal- or State-supported education programs or for compliance with federal legal requirements related to these programs.

This P20 WIN Research Agenda, proposed by the Data Governing Board, is subject to each participating agency head agreeing upon the framework and research priorities. As state and agency data needs evolve, this framework will need to be updated; therefore, the Data Governing Board may propose changes to this document for agency heads to approve.

This draft P20 WIN research agenda builds upon the work of the Connecticut Higher Education Coordinating Council and encourages analysis that supports a better understanding of how our educational programs are affecting Connecticut's progress toward the following goals.

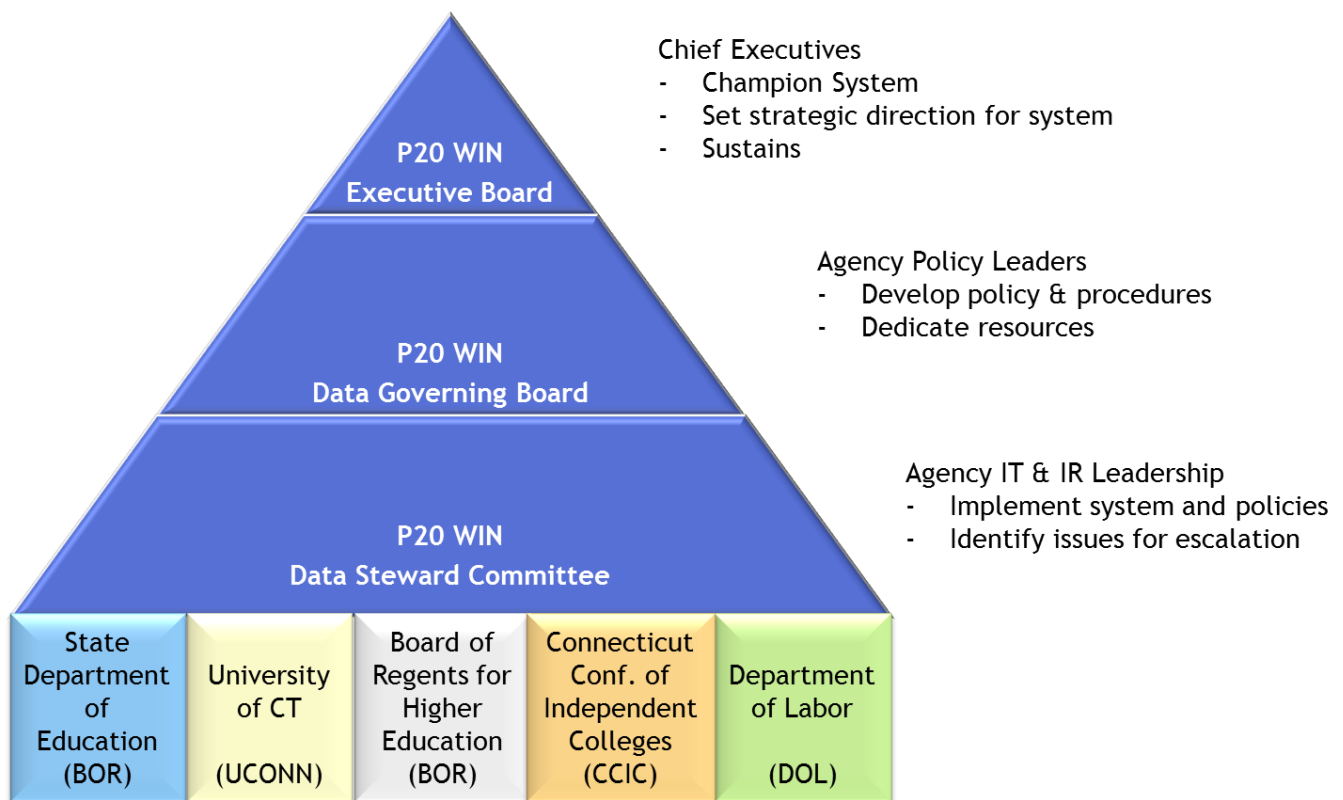
- **Successful Transitions:** Increase the number of students who are ready for the transitions between early care and Kindergarten, Kindergarten and elementary school, elementary school and middle school, middle school and high school, high school and a post-secondary institution or the labor market.
- **College Readiness:** Prepare more high school graduates, GED graduates and adults to enter college prepared for college-level work.
- **Student Success:** Graduate more students from high school and post-secondary with the knowledge and skills to achieve their life and career goals.
- **Effectiveness of Teacher Education:** Increase the level of teacher preparedness.
- **Affordability and Sustainability:** Maximize access to higher education by making attendance affordable and our institutions financially sustainable.
- **Innovation and Economic Growth:** Create educational environments that cultivate innovation and prepare students for successful careers in a fast changing world.
- **Equity:** Eliminate achievement disparities among different ethnic/racial economic and gender groups.

3.0 P20 WIN DATA GOVERNANCE MODEL

The P20 WIN cross-agency data governance system provides the structure through which agency representatives can create and implement the necessary policies and procedures for a multi-agency data sharing system in order to address broad policy questions and state needs.

3.1 Model

The structure necessary to support P20 WIN data governance discussions and decision making is represented by a three-tiered model. This model includes a Data Governance Executive Board, a Data Governing Board and a Data Steward Committee. Together these three groups provide a framework for system leadership, policy creation, system implementation, maintenance and improvement. Escalation of issues, questions and recommendations move up the model while the dissemination of decisions and implementation of P20 WIN initiatives moves down through the tiers of the model.



3.2 Participating Agencies

The State Department of Education (SDE), The Connecticut State Colleges and Universities (CSCU), the Department of Labor (DOL), the University of Connecticut (UConn) and the Connecticut Conference of Independent Colleges (CCIC) are actively collaborating to support the P20 WIN System. The system is designed with the flexibility to expand and include connections to additional organizations such as the Early Childhood Office. The process for an agency or state organization to join P20 WIN is defined in the “Protocol to Expand P20 WIN” within this manual.

Each participating agency is responsible for the data that reside in their respective systems. The Data Governance Policy does not affect data that is not shared through P20 WIN. Rather, this policy covers only the data that is shared between organizations both at the unit and aggregate level through P20 WIN. While data will be transported, matched and eventually stored electronically, this policy covers the use of shared data in reports and documents whether electronic or in print.

3.3 Data Governance Policy

Section 3.3 is a copy of the text in the signed Data Governance Policy. A .pdf of the signed policy is located at:

http://www.ct.edu/files/pdfs/AttachmentD_P20WIN_DataGovernancePolicy_Signed_052815.pdf.

Sections 3.4 through 3.7 provide information necessary for understanding how the Data Governance Policy will be operationalized. This policy is also included in each P20 WIN MOA as Attachment D.

P20 WIN Data Governance Policy

A policy to establish
a vision for interagency data sharing
and the process and structure for data governance
as it pertains to Connecticut’s Preschool through 20 &
Workforce Information Network
- P20 WIN -

Prepared by,
P20 WIN Data Governance Committee
Published: October, 2014
Version 2.0

Definitions: for the purpose of this policy, the following definitions shall apply:

- A. **Data Definitions** are the plain language descriptions of data elements. The definitions should be specific enough to allow users to fully understand the data elements.
- B. A **Data Dictionary** is a listing of the names of a set of data elements, their definitions and additional meta-data. A data dictionary does not contain any actual data rather it serves to provide information about the data in the data set.
- C. **Data Elements** are units of information as they are stored or accessed in any data system. For example, data elements about a student's academic history could include: student ID number, course code, credits attempted, cumulative grade point average, et cetera.
- D. **Meta-Data** refers to the information about a data element that provides context for a data element such as its definition, storage location, format and size.
- E. **Participating Agencies:** The Participating Agencies are the Connecticut State Colleges and Universities (CSCU), the Connecticut State Board of Education, the Connecticut Department of Labor and those entities that have executed a similar Memorandum of Agreement for participation in P20 WIN and that have been approved for participation by all Participating Agencies.
- F. **"Preschool through Twenty and Workforce Information Network"** or "P20 WIN" is a federated data system for the purpose of matching and linking longitudinally data of state agencies and other organizations for the purpose of conducting audits and evaluations of Federal- and State-supported education programs.
- G. **P20W** refers to prekindergarten, including early childhood, Kindergarten through twelfth grade (K12), postsecondary education, advanced and lifelong learning, and the workforce.
- H. **Data Request Management:** The required review process for each Data Request posed to the system. The Data Request Management process is set forth in the P20 WIN Data Request Management Procedure. Notwithstanding to the contrary in said Procedure, in all cases no data will be included in the data match for any given Participating Agency unless the given Participating Agency has approved the inclusion of its data and has approved the individual(s) or entities who have authority to access to the resulting data set.

Vision

Connecticut's Preschool through Twenty and Workforce Information Network (P20 WIN) informs sound educational policies and effective educational program practices through the secure sharing of critical longitudinal data across the Participating Agencies to ensure that individuals successfully navigate educational pathways into the workforce.

Rationale

Answering policy questions to support improvements in state and local educational practices often requires linking information from multiple agencies. A data sharing system that connects data across agencies and also supports a broad policy agenda requires a governance structure that will support and maintain data sharing efforts securely and systematically. It is critical to have policies and procedures in place to ensure data quality, data security, data confidentiality, the protection of individual privacy and

system sustainability. Without this structure in place to oversee and support ongoing management, maintenance and enhancement of cross-agency data sharing, the opportunity to collaborate is limited.

Policy Statement

This policy establishes the processes and structures governing any and all data sharing between the Participating Agencies through P20 WIN. P20 WIN is to be a mechanism through which Participating Agencies obtain longitudinal data that crosses agency borders in order to better understand Connecticut's educational programs and outcomes and their relationships to employment programs and outcomes. This policy governing data sharing is intended to provide the standards necessary to ensure the proper management and security of any and all data shared through P20 WIN. This policy, establishes a strategic framework to guide Participating Agencies' decision making regarding data sharing. This governance policy:

1. Establishes the P20 WIN Data Governance Executive Board, Data Governing Board and Data Steward Committee as the cross-agency bodies that will establish and implement data governance policies within and across agencies in accord with applicable federal and state law and the authority of each of the Participating Agencies.
2. Provides that the P20 WIN Data Governance Executive Board will set the strategic direction for P20 WIN and that its members will take appropriate steps to secure the necessary resources to support system implementation and improvement.
3. Provides for the P20 WIN Data Governing Board to establish in accordance with applicable law and their members' statutory authority additional detailed interagency standards and processes for the (a) communication about, and (b) definition, integration, storage, access, and reporting of data to improve quality, utility, and protection of shared data.
4. Provides for the P20 WIN Data Steward Committee to implement components of the system at the agency level as authorized by the Board member for such agency and carry out policies approved by the Data Governing Board.
5. Designates Participating Agencies as stewards to P20 WIN in that each agency is responsible for lending subject matter and technical expertise to the governance process. While agencies maintain control and ownership over their own data, their participation in P20 WIN requires participating in shared governance of the overall system.
6. Establishes overarching standards for the management and security of the data system.
Defines the Participating Agencies' responsibility to manage and use data in support of their missions in accord with applicable law.

Scope

This P20 WIN data governance policy applies to the data that is shared by Participating Agencies through the P20 WIN. As of the date of this agreement, the Participating Agencies are the Connecticut State Department of Education (SDE), the Connecticut State Colleges and Universities (CSCU), the Connecticut Department of Labor (DOL), the University of Connecticut and the Connecticut Independent College and University Institute for Research and Public Service, Inc. (Cicu-IRPS).

Each Participating Agency is responsible for the data that reside in their respective systems. This policy covers only the data that is shared between Participating Agencies through P20 WIN both at the unit and aggregate level. While data will be transported, matched and eventually stored electronically, this policy

covers the use of shared data at all stages, including but not limited to data used in reports and documents whether electronic or in print.

All decisions pertaining to the use of public funds or resources will be made only by representatives from Participating Agencies which are also state agencies. This requirement shall apply to all boards and committees described herein.

Governance Roles and Responsibilities

A cross-agency data governance system provides the structure through which agency representatives can create and implement the necessary policies and procedures for a multi-agency data sharing system to address broad policy questions and state needs. To achieve this goal, there shall be an Executive Board, Data Governing Board and Data Steward Committee whose tasks are set forth herein. Together these three groups shall provide system leadership, policy creation and system implementation, maintenance and improvement. All decisions of the Executive Board and Data Governing Board must be made by unanimous vote of their members except that any Participating Agency which is not a state agency shall be disqualified from participating in decisions pertaining to the use of public funds or resources.

The Executive Board

The Executive Board is a multi-agency committee that shall provide vision, oversight and leadership for the data governance structure. The Executive Board shall consist of the chief executive officer (e.g., Commissioner or President), or his/her designee, of each Participating Agency. The Executive Board shall have ultimate decision making authority for P20 WIN and each member has the power to hold staff within their respective agencies accountable to the goals of the system. Executive Board Members affirm that the work of P20 WIN adds value to their agencies and to Connecticut as a whole and therefore will work to continue to secure resources for its operation.

Responsibilities

- Advance a vision for P20 WIN including a prioritized research agenda with support from the Data Governing Board and the P20 Council in accord with applicable federal and state law and the authority of each of the Participating Agencies.
- Each Member shall identify representatives from its respective agency to serve on the Data Governing Board.
- Convene to respond to escalated issues from Data Governing Board.
- Identify and work to secure resources necessary to sustain P20 WIN beyond the initial grant funding.
- Champion system implementation, maintenance and improvement by advocating for P20 WIN in regard to policy, legislation and resources.
- Members of this group not only represent the interest of their agency but, consistent with applicable law and their agency's authority, work to support the state's vision for P20 WIN.
- Have overall fiscal and policy responsibility for the system.
- Ensure that in any circumstances in which public funds or resources are to be jointly utilized with those from private entities such arrangements are governed by appropriate agreements approved by the Attorney General

The Data Governing Board

The Data Governing Board establishes and enforces policies related to cross-agency data management including but not limited to data confidentiality and security in alignment with the vision for P20 WIN and applicable law. It is a committee consisting of one staff member from each Participating Agency who has responsibility to recommend policy and the authority to commit resources to support their agency's participation in P20 WIN. Members work collaboratively to develop policies necessary for the implementation, maintenance, security and improvement of P20 WIN. Once policies and resource commitments are approved, the Data Governing Board members are responsible for implementing and enforcing these policies.

Responsibilities

- Identify P20W policy questions aligned with the research agenda as established by the Executive Board.
- Establish data governance policies, including a Data Governance Manual, to enable, improve and sustain P20 WIN. All policies and actions of the Data Governing Board shall be consistent with the Memoranda of Agreement entered into by the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure.
- Provide in accord with applicable law and the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure the most appropriate data from their respective agency source systems to support the accurate and effective implementation of P20 WIN.
- Review and approve requests for data, data output and resulting publications prior to release in accord with applicable law and the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure.
- Specify and produce guidelines for reports that P20 WIN might produce on a regular basis.
- Identify data stewards/managers to participate in Data Steward Committee and address escalated issues and questions as generated by the Data Steward Committee and other stakeholders.
- Establish a protocol for expanding the data system to include additional agencies or data. The protocol shall require approval of the Executive Board.
- Members of this group not only represent the interest of their agency but consistent with applicable law and their agency's authority, work to support the state's vision P20 WIN.

The Data Steward Committee

The Data Steward Committee develops recommendations and provides oversight for the technical implementation of the P20 WIN data system and is responsible for the availability, security and quality of data shared through P20 WIN. Members from each agency shall serve on the committee consisting of two subject matter experts: a primary data user, such as an institutional researcher, and a primary information technology person. The Data Steward Committee recommends to the Data Governing Board policies or practices that need to be developed or improved and is then responsible for implementing the processes necessary to carry out the approved data system policies.

Responsibilities

- Implement policies and processes as approved by Data Governing Board.
- Define data standards and data cleansing processes.

- Develop, document and monitor data definitions and meta-data for shared data elements.
- Evaluate the quality of the technical process for matching data and the quality of the data available through the system.
- Make recommendations to the Data Governing Board on policies and procedures that need to be created or improved including but not limited to policies and procedures to ensure data security.
- Members of this group not only represent the interest of their agency but consistent with applicable law and their agency's authority, work to support the state's vision for P20 WIN.

Processes

Together the P20 WIN data governing bodies work in concert to ensure that the following processes operate smoothly.

- Response to data requests
Requests for data from P20 WIN are directed through the Data Governing Board which establishes processes for managing individual data requests from the point of application through the production of reports or documents that use data from the resulting matched data set. This process is governed by the P20 WIN Data Request Management Procedure document.
- Determination of authorized users and access rights to resultant data sets.
In accord with applicable law and the Memoranda of Agreement entered into by the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure, the Data Governing Board (i) approves the users who are to have access to de-identified unit record data from P20 WIN and (ii) establishes the parameters for data dissemination and destruction.
- Development and maintenance of cross-agency data dictionary
The Data Steward Committee is responsible for ensuring that the data dictionary for each Participating Agency is complete and up-to-date.
- Establishment of guidelines for data analysis as necessary
The Data Governing Board establishes processes that support a common approach to data analysis for resultant data sets as appropriate.
- Expansion of P20 WIN
The Executive Board approves a protocol for expanding the data system to include additional agencies or state organizations or additional data so that the technical infrastructure is expanded and new agencies have representation in the named committees. Such additions shall require unanimous consent of the Participating Agencies and only occur after consultation with the Office of the Attorney General.
- Establishment of policies to sustain P20 WIN
The Executive Board establishes agreement and policies to sustain and improve P20 WIN including how P20 WIN will be staffed and supported financially after the term of the grant.
- Modification of this policy
The Data Governing Board can make recommendations to modify this policy to the Executive Board.

Program Support

To allow for smooth continuation of system development and to support the work of the Executive Board, the Data Governing Board and the Data Steward Committee past the initial grant phase, the functions of financial and program management will be provided by staff from the CSCU with oversight from the Executive Board for a period of six months after the end of the grant period. Upon review by the Data Governing Board, this term of service may, with consent of the CSCU, be extended in increments of six months. This support function may be replaced by a different administrative model as approved by all members of the Executive Board.

Duration

This policy shall be in effect from the date of the last signature and shall remain in effect until revised or terminated. If the Participating Agencies change, an amendment expressing the change shall be signed by the new Executive Board members.

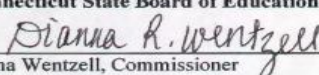
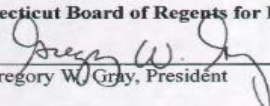

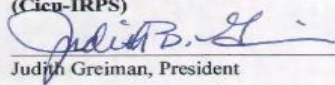
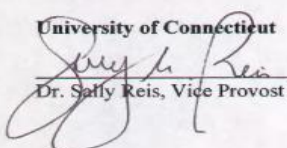
Commitment

As members of the P20 WIN Data Governance Executive Board, we affirm the vision and policy set forth in this document. This is a snapshot of the signature page from the official document which can be found at: http://www.ct.edu/files/pdfs/AttachmentD_P20WIN_DataGovernancePolicy_Signed_052815.pdf

Renewed Commitment

This addendum to the P20 WIN Data Governance Policy, Appendix D to the P20 WIN MOAs, demonstrates unanimous agreement to include the University of Connecticut as a Participating Agency in the Preschool through Twenty and Workforce Information Network (P20 WIN)

As members of the P20 WIN Data Governance Executive Board, we affirm the vision and policy set forth in this document.

Connecticut State Board of Education  Diana Wentzell, Commissioner	<u>5/27/15</u> Date
Connecticut Board of Regents for Higher Education  Dr. Gregory W. Gray, President	<u>5/27/15</u> Date
Connecticut Department of Labor  Dennis Murphy, Deputy Commissioner	<u>5/27/15</u> Date
Connecticut Independent College and University for Research and Public Service, Inc. (Cicu-IRPS)  Judith Greiman, President	<u>5/27/15</u> Date
University of Connecticut  Dr. Sally Reis, Vice Provost for Academic Affairs	<u>5/27/15</u> Date

4.0 P20 WIN EXECUTIVE BOARD

Section 4.0 matches the approved Data Governance Policy, but includes some additional information on membership and the decision making process.

4.1 Mission & Authority

The P20 WIN Executive Board provides vision, oversight and leadership for the complete data governance structure. It has ultimate decision making authority for the P20 WIN data system and has the power to hold staff within their respective agencies accountable to the goals of the system. P20 WIN Executive Board Members affirm that the work of the data collaborative adds value to their agencies and to Connecticut as a whole and therefore work to ensure continued commitment of resources.

4.2 Scope and Responsibility

As established through the P20 WIN Data Governance Policy, the P20 WIN Executive Board is the ultimate authority on escalation of issues, questions and recommendations from the P20 WIN Data Governance Board.

The Executive Committee shall:

- Have overall fiscal and policy responsibility for the system.
- Advance a vision for P20 WIN including a prioritized research agenda considering input from the Data Governing Board and the P20 Council.
- Identify representatives from respective participating agency to serve on the Data Governing Board.
- Convene to respond to escalated issues from Data Governing Board.
- Identify and work to secure resources necessary to sustain P20 WIN beyond the initial grant funding.
- Champion system implementation, maintenance and improvement by advocating for P20 WIN in regard to policy, legislation and resources.
- Members of this group not only represent the interest of their agency but, consistent with applicable law and their agency's authority, work to support the state's vision for P20 WIN.

4.3 Membership

The P20 WIN Executive Board shall consist of the agency head of all participating agencies or state organizations that are contributing data to P20 WIN. If it is necessary for the participating agency or organization head to appoint a designee to attend an Executive Board meeting, that designee should be able to make decisions on behalf of the agency or organization as they pertain to P20 WIN.

- The Executive Board members can appoint a facilitator to coordinate meetings and keep minutes as needed.

- A minimum of one Data Governance Board representative shall act as a non-voting member of the Executive Committee.

4.4 Member Expectations

All members of the P20 WIN Executive Board are expected to:

- Represent the interests of the state and the state’s vision for P20 WIN.
- Ensure that appropriate resources from their agency or organization are allocated and aligned to support the work of P20 WIN.
- Attend Executive Board sessions when escalated issues require a meeting.
- Advocate for P20 WIN to stakeholders including legislative representatives.

4.5 Decision-making Process

In order to maintain a functioning system and address P20 WIN issues in a timely manner, the Executive Board shall meet as needed. Executive Board meetings may be convened through the P20 Council, the Governor’s cluster meetings or separately, and attendance at meetings may be in person, by phone or by internet interface.

The P20 WIN Executive Board is the final authority on issues escalated beyond the P20 Data Governance Board.

The voting rights and process will adhere to the following:

- Executive Board members are authorized to make decisions on behalf of their respective member organizations.
- Executive Board decisions shall be unanimous and made through consensus among members.
- With the exception of decisions about the use of public funds, Executive Board members are all given equal input into decisions, and all members must concur before a decision can be approved.
- Decision about the use of public funds will be made by public Participating Agencies.
- If Executive Board members are unable to reach a consensus, the issue may be brought to the attention of the Governor’s office for assistance in reaching a resolution.

5.0 P20 WIN DATA GOVERNING BOARD

Section 5.0 matches the approved Data Governance Policy, but includes some additional information on membership and the decision making process.

5.1 Mission & Authority

The Data Governing Board establishes and enforces policies related to cross-agency data management including, but not limited to data confidentiality and security in alignment with the vision for P20 WIN and applicable law. Members work collaboratively to develop policies necessary for the implementation,

maintenance, security and improvement P20 WIN. Once policies and resource commitments are approved, the Data Governing Board members are responsible for implementing and enforcing those policies.

5.2 Scope and Responsibility

As established through the P20 WIN Data Governance Policy, the P20 WIN Data Governing Board is responsible for developing and recommending policies to the P20 WIN Executive Board and for the implementation of those policies once approved.

The P20 WIN Data Governing Board shall:

- Identify P20W policy questions aligned with the research agenda as established by the Executive Board.
- Establish data governance policies, including a Data Governance Manual, to enable, improve and sustain P20 WIN. All policies and actions of the Data Governing Board shall be consistent with the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure.
- Provide in accord with applicable law and the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor and the P20WIN Data Request Management Procedure the most appropriate data from their respective agency source systems to support the accurate and effective implementation of P20 WIN.
- Review and approve requests for data, data output and resulting publications prior to release in accord with applicable law and the Memoranda of Agreement entered into between the Participating Agency and the Department of Labor, and the P20WIN Data Request Management Procedure.
- Specify and produce guidelines for reports that P20 WIN might produce on a regular basis.
- Identify data stewards/managers to participate in Data Steward Committee and address escalated issues and questions as generated by the Data Steward Committee and other stakeholders.
- Establish a protocol for expanding the data system to include additional agencies or data. The protocol shall require approval of the Executive Board.
- Members of this group not only represent the interest of their agency but consistent with applicable law and their agency's authority, work to support the state's vision P20 WIN.

5.3 Membership

The P20 WIN Data Governing Board shall consist of one staff member from each participating agency or organization who has responsibility to recommend policy and the authority to commit resources to support their agency's participation in P20 WIN and includes the P20 WIN Program Manager.

- Members of the Data Governance Board are identified by the agency head or designee of their respective organizations.

- Members are selected based on the internal roles and responsibilities at their respective organizations. Data Governance Committee members should have a thorough understanding of (1) the policies and programs represented by the data in their agency or organization, and (2) the data collected by their agency or organization including definitions and intended purpose(s).
- Member vacancies shall be filled by the agency head or designee of a participating agency's organization. Until representatives are appointed, agency heads or designees shall have the authority to vote on behalf of their respective member organizations.
- A Data Governance Board representative shall act as a non-voting member of the Executive Committee
- The P20 WIN Program Manager shall act as a non-voting member of the Data Governing Board in order to facilitate meeting discussions.

5.4 Member Expectations

All members of the P20 WIN Data Governing Board are expected to:

- Represent the interests of the state and the state's vision for P20 WIN
- Communicate regularly with their agency staff regarding activities and decisions of the Data Governing Board
- Support and advocate data management and governance practices to their agency staff.
- Attend and participate in Data Governing Board meetings
- Share with Data Governing Board members any data issues, new data regulations or new policies that affect or have the potential to affect P20 WIN.

5.5 Decision-making Process

As established by the P20 WIN Data Governance Policy, members of the Data Governance Board have the authority to create and amend policies to support the development and improvement of P20 WIN. With this authority comes the responsibility to meet regularly to proactively address issues as they arise and are anticipated. At minimum, the Data Governing Board members shall meet monthly. Attendance at meetings may be in person, by phone or by internet interface.

Voting rights and process will adhere to the following:

- Data Governing Board decisions shall be unanimous and made through consensus among members.
- Data Governing Board members are all given equal input into decisions and all members must concur before a decision can be approved.
- If members are not present for a meeting at which a decision needs to be made, then the decision cannot be finalized until the missing members have provided their input so that a consensus can be established.
- If a consensus cannot be reached by Data Governing Board members, then the issue can be escalated to the Executive Board if necessary.

6.0 P20 WIN DATA STEWARD COMMITTEE

Section 6.0 matches the approved Data Governance Policy, but includes some additional information on membership and the decision making process.

6.1 Mission & Authority

The Data Steward Committee develops recommendations and provides oversight for the technical implementation of P20 WIN and is responsible for the availability, security and quality of data shared through P20 WIN. The Data Steward group recommends to the Data Governing Board policies or practices that need to be developed or improved and is then responsible for implementing the processes necessary to carry out the approved data system policies.

6.2 Scope and Responsibility

As established through the P20 WIN Data Governance Policy, the P20 WIN Data Steward Committee is responsible for implementing practices and procedures at the agency level which support the decisions and policies that are approved by the Data Governing Board and the Executive Board.

The P20 WIN Data Steward Committee shall:

- Implement policies and processes as approved by Data Governing Board.
- Define data standards and data cleansing processes.
- Develop, document and monitor data definitions and meta-data for shared data elements.
- Evaluate the quality of the technical process for matching data and the quality of the data available through the system.
- Make recommendations to the Data Governing Board on policies and procedures that need to be created or improved including but not limited to policies and procedures to ensure data security.
- Members of this group not only represent the interest of their agency but consistent with applicable law and their agency's authority, work to support the state's vision for P20 WIN.

6.3 Membership

The P20 WIN Data Steward Committee shall include two standing seats for each of the participating agencies/organizations in P20 WIN. One seat represents the organization's utilization of data and one seat represents the organization's technical knowledge. The P20 WIN Program Manager shall be a non-voting member.

- The initial members of the Data Steward Committee shall be identified by their agency's representative to the Data Governing Board.
- Members are selected based upon the internal roles and responsibilities at their respective organizations. One member shall be a primary data user, such as an institutional researcher who has in-depth knowledge of their agency data, collections, quality and availability. The second

member shall be an information technology leader who has authority to enable technical development that supports the agencies or organizations physical connection to P20 WIN. Member vacancies shall be filled by the agency's representative to the Data Governing Board. Until representatives are appointed, Data Governing Board members shall have the authority to vote on behalf of their respective member organizations.

6.4 Member Expectations

All members of the P20 WIN Data Steward Committee are expected to:

- Bring issues to the Data Steward Workgroup that need to be addressed and help to propose resolutions.
- Provide data analysis related to member's specific agency or organization
- Communicate data quality issues back to member agency or organization staff
- Communicate to the Data Steward Workgroup any source data system changes and their potential impact upon P20 WIN
- Communicate to the member agency or organization any P20 WIN data system changes and their potential impact upon the source system
- Attend Data Steward Committee meetings in person
- Identify and engage member organization subject matter experts as needed.

6.5 Decision-making Process

As established by the P20 WIN Data Governance Policy members of the P20 WIN Data Steward Group have the authority to implement the policies, practices and procedures within their respective agencies in support of the policies approved and decisions made by the Data Governing Board for the benefit of P20 WIN and the state. With this authority comes the responsibility to identify issues specific to the members' respective organizations for discussion and common resolution. As an advisory body, the Data Steward Committee will not be establishing binding decisions for P20 WIN. Rather issues that cannot find resolution within the Data Steward Committee members themselves will be identified for escalation to the Data Governing Board.

The process for issue resolution will adhere to the following:

- Data Steward Committee decisions and recommendations shall be made by consensus of representatives from the affected Participating Agencies.
- The two representatives from each participating agency or organization will find a common position between themselves as their organizations position on the various issues.
- If there is dissent among Data Steward Committee members, the item may be documented and escalated to the Data Governing Board for resolution.
- If less than half of the member organizations are represented, then a quorum does not exist and no official business can be conducted.

7.0 P20 WIN PROGRAM SUPPORT

7.1 System Support

P20 WIN is a multi-agency collaborative with responsibility for maintaining and enhancing system operations, managing funds and producing information useful to the state for improving education and workforce outcomes. As such staff is needed to provide support for P20 WIN.

Most individuals involved in P20 WIN are employees of participating organizations. The participating agencies are collective stewards for the system, and it is expected that their respective staff members will be actively engaged in maintaining and improving the system in accordance with the P20 Data Governance Policy through the Executive Board, the Data Governing Board and the Data Steward Committee.

In addition to individuals who primarily support their agency's involvement in P20 WIN, staff is needed to provide cross-agency administrative support. The roles and functions described here articulate the cross-agency support needed to ensure P20 WIN is utilized, maintained and improved.

7.2 Financial Management

The operation of P20 WIN requires support of staff from the finance office of one of the Participating Agencies.

Functions of the finance office include:

- Working with P20 WIN Manager to ensure that the budget, funds and expenses are appropriately managed.
- Receiving, tracking and processing invoices
- Assisting in development of MOA and contracts
- Budgeting
- Procurement of goods or services if necessary for system maintenance or improvement

7.3 Program Management

7.3.1 Roles of the P20 WIN Manager

The P20 WIN Manager serves as the point person for administrative activities pertaining to the operation of P20 WIN. Because P20 WIN is a cross-agency system, it requires individuals from the separate agencies to work in concert. Communication and collaboration need to occur between all participating agencies at each level of the data governance structure to ensure that processes are followed and the system is improved. The Manager provides the support required to bring representatives from participating agencies together to address issues that require cross-agency input.

7.3.2 Scope and Responsibility

As established through the P20 WIN Data Governance Policy, the P20 WIN Manager is responsible for supporting smooth continuation of system development as required by the Executive Board, the Data Governing Board and the Data Steward Group.

The P20 WIN Manager:

- Serves as the point person for communications pertaining to P20 WIN from the participating agencies and other stakeholders
- With input from Data Governing Boards and Committees, develops and implements a stakeholder communication and engagement plan.
- Assists Executive Board, Data Governance Board and the Data Steward Committee in the performance of their responsibilities such as the development of a research agenda
- Promotes and supports the meaningful utilization of data obtained through P20 WIN by its stakeholders
- Develops and manages processes for receiving requests for data from P20 WIN and tracking them through to resolution including ensuring that data destruction dates are followed
- With appropriate agency and legal representation, manages revisions, renewals and amendments to data sharing agreements and vendor contracts.
- Manages operational budget and works with finance office staff for timely processing of invoices and contract management.
- Provides processes and mechanisms for tracking and resolving issues pertaining to the operation and improvement of P20 WIN
- Coordinates cross-agency system testing, issue identification and resolution.
- Works with committee members to define agendas, facilitate meetings and ensure that notes are taken and distributed.
- Supports the scheduling and convening of the Executive Board, Data Governing Board and the Data Steward Committee as necessary.

7.4 Term of Service

To allow for smooth continuation of system development and to support the work of the Executive Board, the Data Governing Board and the Data Steward Committee past the initial grant phase, the functions of financial and program management will be provided by staff from the CSCU with oversight from the Executive Board for a period of six months after the end of the grant period. Upon review by the Data Governing Board, this term of service may, with consent of the CSCU, be extended in increments of six months. This support function may be replaced by a different administrative model as approved by all members of the Executive Board.

8.0 DATA ACCESS & PRIVACY POLICY

The Data Access & Privacy Policy is articulated in each of the data sharing agreements that have been established between the participating and hosting agencies. Together these agreements form the policy that establishes how data linked through P20 WIN will be managed so that access is limited, data are secure and privacy is maintained. Official documents are located at:

<http://www.ct.edu/initiatives/p20win#process>. The language in this section is intended to highlight key information from these data sharing agreements and provide additional detail as to how data access and privacy will be managed in practice.

P20 WIN and its participating agencies adhere to the confidentiality requirements of both federal state laws including, but not limited to the Family Educational Rights and Privacy Act (FERPA), the Individuals with Disabilities Education Act (IDEA), the Protection of Pupil Rights Amendment (PPRA), the National School Lunch Act, the Health Insurance Portability and Accountability Act (HIPPA) and state and federal labor law. The following definitions pertinent to addressing privacy issues are derived from these and other related documents.

8.1 Key Terms and Definitions:

The following definitions are the same as provided in FERPA and the regulations promulgated thereunder, as amended from time to time. As of January 31, 2013, such definitions are as follows:

- A. **Authorized Representative:** An Authorized Representative is any entity or individual designated by a State or local educational authority or an agency headed by an official to conduct, with respect to Federal or State supported education programs, any audit or evaluation, or any compliance or enforcement activity in connection with Federal legal requirements that relate to these programs.
- B. **Education Program:** An education program will be defined as specified in the FERPA regulations, §99.3. An education program includes programs that are principally engaged in the provision of education, including, but not limited to, early childhood education, elementary and secondary education, postsecondary education, special education, job training, career and technical education, and adult education, and any program that is directly administered by an educational agency or institution. For a definition of “early childhood program” please refer to §99.3 of the FERPA regulations.
- C. **Personally Identifiable Data:** Personally identifiable data from education records (PII) is information from education records that can be used to distinguish or trace an individual’s identity. Under FERPA [34 CFR § 99.3], PII includes but is not limited to:
 - 1 The student’s name
 - 2 The name of the student’s parent or other family member
 - 3 The address of the student or student’s family
 - 4 A personal identifier, such as the student’s social security number, student number or biometric record
 - 5 Other indirect identifiers, such as the student’s date of birth, place of birth, and mother’s maiden name.

- 6 Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty
 - 7 Information requested by a person who the education agency reasonably believes knows the identity of the student to whom the education record relates.
 - 8 Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.
- D. Re-disclosure:** Re-disclosure means transfer or disclosure of PII to any other person or entity whose access to PII is not specifically authorized in this Agreement.
- E. Participating Agencies:** The Participating Agencies are the Connecticut State Colleges and Universities (CSCU), the Connecticut State Board of Education, the Connecticut Department of Labor and those entities that have been approved for participation in P20 WIN by every Participating Agency and that have executed a similar Memorandum of Agreement with UCHC and BEST.
- F. Data Request Management:** The required review process for each Data Request posed to the system. The Data Request Management process is set forth in the P20 WIN Data Request Management Procedure which is Appendix C to each Participating Agency's data sharing agreement.

The Data Request Management process consists of the following practices and activities:

- Document the purpose of the Data Request as it pertains to conducting an audit/evaluation of education programs as allowed by FERPA
- Designate which authorized individuals will initiate the Data Request
- Identify the specific data elements in each data set needed to satisfy the Data Request and to be a part of queries to the data system
- Ensure that each agency whose data would be included in the data match has approved the inclusion of their data before queries is processed
- Designate the individual(s) who have authority to access to the resulting data set
- Document the plans for data analysis and reporting of data from the resultant data set
- Ensure that each agency whose data is included has an opportunity to review and provide feedback on any report that is to be made public prior to publication.
- Reiterate requirements for data security

8.2 Method of Data Linkage

To evaluate both K-12 and postsecondary education programs and assess the degree to which education programs are preparing students for post-secondary education and the workforce, education and labor record data from the participants' data systems is linked at the unit record level to determine patterns over time.

After a data request has been approved in accord with the P20 WIN Data Request Management Procedure, Participating Agencies whose data is a part of the request shall send files to DOL which contain only limited PII for matching the records that are needed to satisfy the approved Data Request. In addition to limited PII, each input file shall contain a generic unique identifier for each person record.

The generic unique identifier will bear no resemblance to or contain any part of an individual's education data.

Upon receipt of all required input data sets, DOL shall utilize data matching software approved by the Data Governing Board to identify matches between the data sets. Once the matching is complete, DOL will strip the PII from the matched data file. The stripped PII and the PII in the original data files shall be destroyed. The resulting file, containing a matrix of the generic unique identifiers that reflects how the original data sets can be linked, shall be sent to the approved requestor for the completion of the approved data request. Destruction of the original files used for matching will occur within 5 business days after DOL receives confirmation from the Data Steward Committee members whose data were a part of the Data Request that the matching activity for the given Data Request is complete. Data destruction will occur within 24 hours of notification for any data set that includes data from an institution that is a member of the Connecticut Conference of Independent Colleges.

In all cases, Participating Agencies send data from their systems to DOL and the approved requestor via a secure data connection.

Agencies should follow these data formatting recommendations when creating their file set for data matching.

Data Element Name	Definition	Format	Comment
Last Name	Last name of student	Text	okay as is
Middle Name	Middle name of student	Text	okay as is
First Name	First name of student	Text	okay as is
Date of Birth	Date of birth of student	YYYYMMDD	
Gender	Gender of student	Text	
High School Code	College Board High School Code assigned to the high school (e.g. 70323 - RHAM High School)	include leading zero	
High School Name	Text name of the student's high school	Text	
SASID	State Assigned Student Identification Number	Text	there are no leading zeros
Social Security Number	State Assigned Student Identification Number	include leading zero	

8.3 Confidentiality

Even though key identifiers such as name and Social Security Number are not retained in resulting data sets, the resulting data set will contain enough associated information about individuals that it might be possible for others who do not have personal knowledge of relevant details to identify a student with reasonable certainty. Therefore, participating agencies are required to safeguard the use, publication and

disclosure of all information received through data sharing in accordance with all applicable federal and state laws regarding confidentiality.

Staff at participating agencies must conduct analysis in a manner which does not permit personal identification of individuals or their parents by anyone other than representatives of the participating agency. Participating agencies and their staff will take steps to maintain the confidentiality of data from the education records at all times by using appropriate disclosure avoidance techniques as defined in this policy.

Only individuals who have been identified as having legitimate interests in the evaluation or who provide system support and who have also signed a ‘Personal Statement of Confidentiality and Non-Disclosure’ (NDA) will be allowed to access non-aggregated data from the matched data set for analysis. It is important to note that persons who are not state government employees or officials may not have access to unit level wage data. Except for the resultant data sets that will be returned to the participating agencies and organizations, unit level data will not be disclosed.

Results from any analysis or evaluation of education programs will be published in a manner that protects the privacy and confidentiality of the individuals involved. Tables will utilize disclosure avoidance techniques such as cell suppression, blurring, perturbation as appropriate. Care will be taken when utilizing cell suppression alone to employ additional methods to ensure that sensitive student counts cannot be found through the use of available percentages or data in other related tables. Data users will refer to the best practices outlined by the National Center for Education Statistics SLDS in [Technical Brief 3](#) “Statistical Methods for Protecting Personally identifiable Information in Aggregate Reporting ” to minimize, to the greatest extent possible, the risk that individuals could be identified.

8.4 Data Security

The importance of securing sensitive data cannot be understated; therefore, the following provisions will be followed by agencies and organizations and their staff who participate in P20 WIN. The provisions as listed in this manual reflect but do not replicate the language in the MOA which enable agency participation in P20 WIN. For legal reference, refer to the MOA.

Transmission and storage of all data pertaining to individual’s educational records and unemployment insurance records will adhere to generally accepted best practice standards related to information security, including, but not limited to, commercially available and widespread precautionary measures, such as firewall implementation, virus scanning, security access control software, logical encryption of data as it leaves the data boundary, secure tunnels and limitation of physical access to confidential information and PII. Upon the reasonable request, the Authorized Representative will disclose and review related policies, procedures, and practices. Specifically:

1. Compliance with the law:

The Approved Requestor agrees to comply with the provisions of FERPA and the provisions of 20 CFR 603 and CGS §31-254, as amended from time to time. For the purposes of the Agreement and the specific projects conducted pursuant to the Agreement and described in addenda to it, FERPA includes any amendments or other relevant provisions of federal law, as well as all requirements of 34 C.F.R. Part 99 and 20 U.S.C. § 1232g. Nothing in this Agreement may be

construed to allow either party to maintain, use, disclose, or share student record information or confidential UC information in a manner not allowed under federal law or regulation

2. Compliance with law regarding confidentiality:

The Approved Requestor shall safeguard the use, publication and disclosure of all information received through data sharing in accordance with all applicable federal and state laws regarding confidentiality.

3. Precautions – safeguarding confidential information in general:

The Approved Requestor shall conduct the audit or evaluation in a manner which does not permit personal identification of individuals or their parents or guardians or any UC claimant or employer. The Approved Requestor shall maintain the confidentiality of data from the education records and unemployment insurance records at all times by using appropriate disclosure avoidance techniques.

4. Authorized Personnel:

The Approved Requestor shall restrict access to PII from student records and confidential Unemployment Compensation (UC) information to only those authorized persons listed in the Data Request Management Document and approved by the Data Governing Board who have legitimate interests in the audit, evaluation or enforcement activity specific to this Agreement and need it to perform the official purpose recognized in this Agreement and addenda to it. Persons who are not state government employees or officials may not have access to unit level wage data.

5. Participating Agency staff:

The Approved Requestor shall ensure that only public agency researchers and designated staff within the approved requestor's organization who have been identified as having legitimate interests in the evaluation or who provide system support and who have also signed a "Personal Statement of Confidentiality and Nondisclosure" (NDA) will be allowed to access non-aggregated data from the matched data set for analysis.

6. Statement of Non-Disclosure:

The Approved Requestor agrees that all personnel authorized to access PII and confidential data provided by the P20WIN agencies shall be fully advised of the confidential nature of the information and the safeguards required to protect the information and execute the NDA.

7. Approved Requestor monitors authorized users:

The Approved Requestor agrees to monitor all authorized users to ensure such users observe the confidentiality requirements outlined in this Agreement and the NDA .

8. Minimizing accidental re-disclosure:

The Approved Requestor agrees that results from any analysis or evaluation of education programs will be published in a manner that protects the privacy and confidentiality of the individuals involved. Tables will utilize disclosure avoidance techniques such as cell suppression, blurring, perturbation as appropriate. Care will be taken when utilizing cell suppression alone to employ additional methods to ensure that sensitive student counts or claimant or employer UC information cannot be found through the use of available percentages or data in other related tables. Data users will refer to the best practices outlined by the National Center for Education Statistics SLDS in Technical Brief 3 "Statistical Methods for Protecting Personally identifiable Information in Aggregate Reporting" to minimize, to the greatest extent possible, the risk that individuals could be identified.

9. Data used for the designated purposes only:
The Approved Requestor shall only utilize the data received through a Data Request to meet the purpose as described in the Data Request Management Document. The approval given to receive for one Data Request does not confer approval to use it for another purpose.
10. No re-disclosure to unapproved individuals or subcontractors:
The Approved Requestor shall not re-disclose the data received through this Data Request approval process to any public official who has not been authorized by the Data Governing Board to receive it, and who does not have an active NDA on file. No subcontractor of the Participating Agencies may have access to confidential UC information.
11. Approved Requestor's responsibility
The Approved Requestor shall take the necessary and appropriate precautions to safeguard personal, confidential information and will comply with all state and federal laws concerning the safeguarding and disclosure of such information.
12. Prohibition to re-identify
The Approved Requestor shall not use this dataset to re-identify individuals.
13. Data ownership
The Approved Requestor agrees that approval to receive data through this Data Request does not convey ownership of the data.
14. Data Governing Board review of reports prior to release
The Approved Requestor agrees that prior to the public release of any documents or reports generated from this query he or she will supply all reports or documents to the Data Governing Board for review and verification that the intended purpose has been adhered to.
15. Data Storage – locked receptacle
The Approved Requestor agrees to store all resultant data, in print or electronic form, in a locked receptacle that can be accessed by authorized persons only.
16. Data Storage – secure computers and files
The Approved Requestor agrees to store all resultant data on secure desktop computers and in secure files to which access is restricted to authorized persons only.
17. Data Storage – use of mobile storage
The Approved Requestor agrees that no resultant data may be transmitted by email or placed or stored on a mobile computing or storage device. For purposes of this agreement, a definition of “mobile computing device” includes, but is not limited to, notebooks, palmtops, PDAs, iPods®, Blackberry ® devices, and cell phones with internet browsing capability. A “mobile storage device” includes but is not limited to, mobile computing devices, diskettes, magnetic tapes, external/removable hard drives, flash cards (e.g., SD, Compact Flash), thumb drives (USB keys), jump drives, compact disks, digital video disks, etc.
18. Data destruction
The Approved Requestor agrees to destroy all confidential information obtained through this agreement as soon as such information is no longer needed or at such time as the Data Governing Board has set whichever occurs sooner.
19. Role of Data Governing Board to monitor

The Approved Requestor agrees that the Data Governing Board will be allowed access to monitor all authorized users to ensure such users observe the confidentiality requirements of the information obtained under this Agreement.

20. Data transmission and storage – best practices

The Approved Requestor agrees that transmission and storage of all data pertaining to an individual's educational records and unemployment insurance records will adhere to generally accepted best practice standards related to information security, including, but not limited to, commercially available and widespread precautionary measures, such as firewall implementation, virus scanning, security access control software, logical encryption of data as it leaves the data boundary, secure tunnels and limitation of physical access to confidential information and PII. While overall system security is a shared responsibility, the Approved Requestor is primarily responsible for the security of the data after it is downloaded.

21. Role of Approved Requestor to monitor those with access:

The Approved Requestor will regularly monitor those persons with access to PII to determine whether the job responsibilities of those persons continue to require access, and will immediately remove access for any person who is determined to no longer need such access. The Authorized Requestor will additionally immediately notify the Governing Board that access has been terminated. The Approved Requestor will take all necessary steps to ensure that any records which are in the possession or control of such persons are timely destroyed as provided in this Agreement.

22. Data Transmission - operational

All data with PII will be transmitted via secure connection such as Virtual Private Network (VPN) or Secure FTP File Transfer Protocol (SSL) connectivity.

23. PII for matching

Critical data elements used for matching, such as name and SSN, will not be transported simultaneously, and they are not included in any permanent resulting data set. Therefore, neither contractors nor members of any Participant's staff will have access to a unit record data set with highly sensitive student identifiers.

8.5 Data Request Management Procedure

The key to implementing the data access and Privacy policy is the Data Request Management Procedure as approved by the Data Governance Board. This procedure details how data requests can be made and how they will be processed. It is incorporated into the MOA which each Participating Agency has to participate in the system. There is a link to the full procedure in Appendix B and here: http://www.ct.edu/files/pdfs/P20WIN-DataRequestProcedure-Final_01202015.pdf.

9.0 Auditing & Quality Control

As P20 WIN does not establish a central combined data repository, the administrators of P20 WIN are not positioned to conduct systematic audits and quality control checks that are typical of traditional data repositories or warehouses. However, even though centralized data quality audits will not be conducted through P20 WIN, participating agencies and organizations will remain subject to regularly conducted audits by their own agencies and auditors and are responsible for ensuring that the data shared through P20 WIN are securely stored and of high quality.

9.1 Defining Data Quality for P20 WIN

In general, data are of high quality if the pieces of information necessary for a specific purpose are available when needed. Given a specific need, the right data fields need to be identified, defined, gathered and readily available. If the data fields are inaccurately described, gathered incompletely or not ready when needed, the quality of the overall dataset is affected. Achieving a high level of data quality involves checking data and conducting audits throughout the processes of data generation, collection and storage.

9.2 The Importance and Maintenance of Metadata

The importance of metadata cannot be understated. Metadata provides contextual information about data elements that are necessary for the proper use of the elements. Metadata includes information about data fields critical to the data user in conducting analysis and to the programmer in maintaining and improving the data system. If the associated metadata fields are not completely or accurately defined for every data element, the potential for error in data usage increases. The National Forum on Education Statistics *Forum Guide to Metadata: The Meaning behind Education Data*, <http://nces.ed.gov/pubs2009/2009805.pdf>, is an excellent resource for understanding meta-data as it applies specifically to K-12 education data.

Through P20 WIN data elements are combined to create new pieces of information about a situation or issue from data sets originating at separate agencies. Each participating agency is responsible for maintaining the metadata about the data fields that they share through P20 WIN. It is expected that each agency will conduct data quality checks at the department, institution and system levels before making their data elements available to be linked with other agency data.

9.3 Assessing Data Quality

P20 WIN is a system where the quality of linked data depends on multiple factors. As shared data is linked using probabilistic data matching routines there will be intrinsic variance between matches from one query to another. For the Data Governing Board and the Approved Data Requestor to be confident that the linked data is of sufficient quality to produce a valid audit or evaluation, the following factors need to be considered for each matched data set.

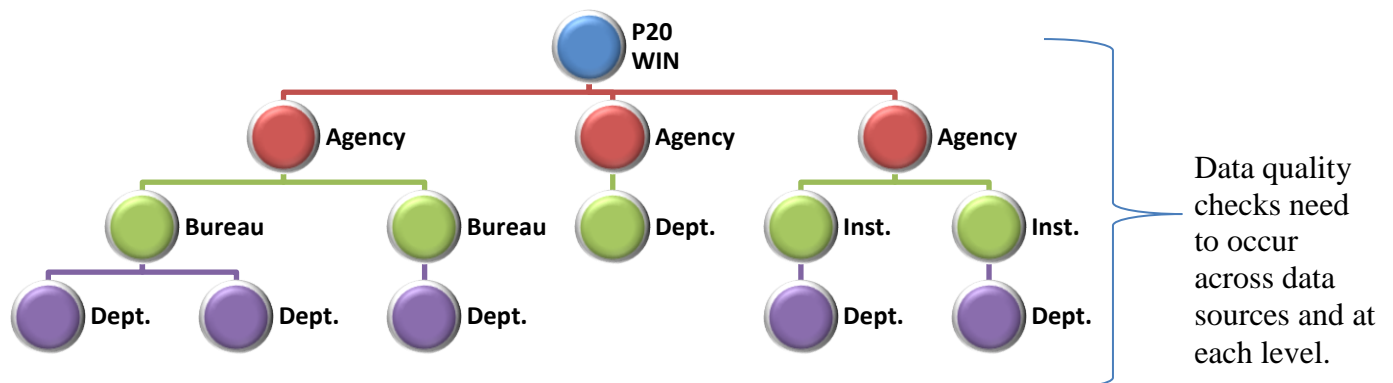
- How many fields were available for conducting the match?
- What is the confidence interval for matches made?
- What percentage of records is populated or data elements with null values?
- What is the history for data elements with no value or many null values?
 - o Have the data fields been consistently updated?

- Is the data field new?
- Is a null value normal for that element?
- What is the meaning of un-matched records?
- Are any data elements used in the query actually proxies for better measures? If yes, does the inclusion of proxies significantly dilute or skew the results?)
- Is there an inherent bias in the results based upon the presence or absence of subgroups within the population being queried?
- Can any concerns about data quality be sufficiently articulated and communicated to the intended audience?
- Does the potential for meaningful and important insight override concerns about data quality to warrant continued analysis?

9.4 Process for Improving Data Quality

Because data quality issues can develop at any point during collection, storage or transformation, data quality improvement processes need to function at multiple levels and across the data sharing structure. In order to prevent and rectify data quality issues as they become known, Participating Agencies will do the following:

- Ensure that data users and data owners have representation on the Data Steward Committee to help identify and improve data quality.
- Identify a process whereby the agency data Governance Board representative and that agency's Data Stewards have designated time for regular communication about data quality issues.
- Utilize a log as provided by the P20 WIN Manager for identifying and tracking data quality issues pertinent to P20-WIN data quality.
- Have a continued effort to maintain and improve documentation about shared data elements.



9.5 System Audit Logs

9.5.1 Introduction

Tracking system activity is important for establishing quality procedures, ensuring that security protocols are followed and for supporting system audits that may be conducted to improve system functionality. The technical framework for P20 WIN is not automated; therefore, audit logs will be manually maintained.

9.5.2 Events Tracked

After a data request is approved by the Data Governing Board and after a corresponding MOA is executed, data may be exchanged between agencies to conduct the approved audit or evaluation. To support this process, the following information will be tracked.

P20 WN Data Request Log

This log tracks Data Requests that are received by the Data Governing Board or P20 WIN Manager for consideration. It is maintained by the P20 WIN Manager as the requests are processed according to the Data Request Management Procedure (Appendix B). Monitored information includes:

- P20 WIN Data Request Number
- Name of Data Request
- Date Request Received
- Type of Submission (initial, continuation, repeat, modification)
- Requestor
- Requestor's organization
- Agencies impacted
- Date of Data Governing Board decision
- Decision status (received, approved, denied)
- List of NDA's needed
- List of NDA's received

Log for tracking Data Matches

This log tracks the data matches that are conducted through P20 WIN. It is maintained by the Agency conducting the data match. Monitored activity should include:

- Date data files are received
- Who sent the data file to DOL
- Who received the data files at DOL
- File name
- Approved Data Request Number
- Data fields included in the files
- Date match conducted
- Date 'matrix' of generic ID's passed to the Authorized Representative, according to the MOA for the Approved Data Request
- Name of Authorized Representative
- Date original input files are destroyed.

9.6 Participating Agency Audits

A best practice for data sharing systems where Personally Identifiable Data (PII) is being exchanged is to allow agencies sharing PII to conduct audits or other monitoring activities of the authorized representative's policies, procedures and systems to ensure that data are as secure as possible.

The MOA between each participating agency and DOL allow the participating agencies to perform an on-site audit and inspection of the system whenever, and as often as, the participating agencies deem appropriate. The audits would be conducted to ensure that the confidentiality requirements of the MOA and all applicable laws and regulations, including applicable amendments are being satisfied.

Likewise, the MOA between the participating agencies and the Authorized Representative who is the Approved Data Requestor also allow the participating agencies to perform an on-site audit and inspection of the Data Requestor's system whenever, and as often as, the participating agencies deem appropriate. These audits would also be conducted to ensure the confidentiality requirements of the MOA and all applicable laws and regulations, including applicable amendments are being satisfied.

Similarly, both DOL and the Approved Data Requestor have a responsibility to monitor those persons with access to confidential information to determine whether the job responsibilities of those persons continue to require access. They should immediately remove access for any person who is determined to no longer need it and take all necessary steps to ensure that any records which are in the possession or control of such persons are timely destroyed as provided in this Agreement.

9.7 User Training

Another best practice for agencies sharing PII is to verify that the recipients of the data have received appropriate training. In addition to conducting agency specific training and information sessions, the U.S. Department of Education has resources available through the Family Privacy Compliance Office (FPCO) Privacy Technical Assistance Center (PTAC).

PTAC provides access to free webinars and training modules which can be utilized by the participating agencies, UCHC and DAS-BEST to inform employees about the sensitivity of the data being shared and to help them protect PII from being disclosed.

- Family Privacy Compliance Office (**FPCO**): <http://www2.ed.gov/policy/gen/guid/fpc/index.html>
- The Privacy Technical Assistance Center (**PTAC**): <http://ptac.ed.gov/>

9.8 New and Departing Employees

When a Participating Agency has a new hire who will be involved in an existing data request, the Participating Agency is required to inform the Program Manager before the new individual can have access to data linked through P20 WIN. The Participating Agency is responsible for teaching the new employee or contractor about the necessity for and processes to maintain data privacy and security. The Program Manager will be responsible for obtaining a NDA for the new individual and facilitating modification of any existing relevant data request documents to enable the new hire to participate in the audit or evaluation as necessary.

When an employee or contractor who had access to P20 WIN data leaves a Participating Agency, the agency who is losing the staff person is required to inform the Program Manager and other Participating Agencies of the departure. This is especially important if the individual had access to uploading or downloading data through secure FTP so that the individual's account can be deleted or password changed as necessary. Notification is required within 24 hours.

9.9 Conducting Analysis with Your Own Agency's Data

When an agency is conducting an audit or evaluation that contains data from their own agency, the agency must destroy the link between the source data and the data sets created to conduct the match in

order to ensure that the analyst or others within the agency are not able to accidentally re-identify individuals in the resultant data set. For example, if the CSCU were conducting analysis that includes SDE, CSCU and DOL data, the original data set that we used to create the match would contain student identifiers and a fake ID. After the match is complete, CSCU would only receive back from DOL a matrix of fake ID's; however, it is technically possible for the analyst to reattach the analytical data back to a source file or data preparation file if the original files containing both the fake and original ID's still exist. In order to mitigate this situation, the source agency must verify to DOL that they have destroyed this connection before DOL will transfer the matrix of fake IDs to them.

In summary, in situations, where the Authorized Representative is not DOL, the Authorized Rep. will e-mail DOL that they have destroyed the link between the primary and fake identifiers before DOL will provide them the matrix of fake ID's. In a situation, where the Authorized Representative *is* DOL, then DOL will e-mail, the other Participating Agencies that they have destroyed the link between original and fake identifiers before the Participating Agencies will provide the data files for analysis.

10.0 PROTOCOL TO EXPAND P20 WIN

P20 WIN was designed with the expectation that it could be expanded in the future to include connections to additional agencies or organizations as audits and evaluations are necessary and state and federal law allow. This section identifies the process for becoming a Participating Agency that contributes to or receives data from P20 WIN.

10.1 Definition of Participating Agency

The Participating Agencies are the Connecticut State Colleges and Universities (CSCU), the Connecticut State Board of Education (SDE), the Connecticut Department of Labor (DOL) and those entities that have been approved for participation in P20 WIN by every Participating Agency and that have executed a Memorandum of Agreement that is similar to the current MOA's of other Participating Agencies.

10.2 Benefits of Participating

P20 WIN is the state's resource for longitudinal information about how individuals navigate through educational pathways into the workforce. This system will allow the Participating Agencies to address important policy questions that cannot be answered without these linkages. Expanding P20 WIN will enhance the State's collective ability to improve programs, practices and policies for the benefit of the individuals we serve.

Participating Agencies will be able to:

- Provide input into the vision for P20 WIN
- Join their data with the data of other participating agencies as allowed by state and federal law
- Participate in the P20 WIN Data Governance process.
- Request linked data as allowable by law and data sharing agreements¹
- Utilize P20 WIN to inform policies and other key initiatives.

10.3 Limitations of being a Participating Agency

Participating Agencies are not required to be public organizations; however, current state law prohibits non-public staff or organizations from receiving unit record wage data from the State Department of Labor. This means that only authorized public agency staff with legitimate interests can receive unit record wage data through P20 WIN. Non-public entities may receive wage record data only after it has been aggregated to the satisfaction of the P20 WIN Data Governing Board.

10.4 How to Join P20 WIN

An agency or organization that would like to become a participant in P20 WIN must go through a review and recommendation process by the Data Governing Board, and Data Governing Board recommendations must be approved by the Executive Committee before the entity may join. An entity interested in joining will go through the following process.

¹ Only Participating Agencies that have legal authority under state law and FERPA or their Authorized Representatives will be allowed to utilize P20 WIN data for audit or evaluations of their education programs.

1. Provide to the P20 WIN Program Manager a formal written request from the chief executive of the interested organization that requests inclusion into P20 WIN. The request should clearly articulate what data will be contributed to P20 WIN, what funding is available for ongoing system support and how the addition of this data supports the P20 WIN vision. In its consideration of the request, the Governing Board may request additional information as needed.
2. If the applicant is not a public agency, the P20 WIN Manager shall consult with the Office of the Attorney General's Department of Health and Education about the formal request.
3. The Data Governing Board reviews the request for inclusion, determines whether to proceed or deny the request, and communicates this decision to the chief executive of the interested organization.
4. If invited, representatives of the interested organization attend a P20 WIN Data Governing Board meeting to discuss joining and develop a potential cost-sharing agreement.
5. The Data Governing Board shares the potential cost-sharing agreement with the State Attorney General's Office and makes a combined recommendation to the P20 WIN Executive Board for consideration.
6. The P20 WIN Executive Board approves or denies the request and that determination is provided in writing to the chief executive of the interested organization.
7. If approved, the leadership of the interested organization will agree to the P20 WIN policies and procedures including, but not limited to, the P20 WIN Data Governance Policy, the P20 WIN Data Request Management Process, the P20 WIN Data Governance Manual and the MOA's between existing participating agencies that enable movement of data.
8. Unanimous agreement to include a new organization in P20 WIN will be demonstrated by having the chief executives of each existing Participating Agency and the newly approved organization sign the P20 WIN Data Governance Policy.
9. The approved organization drafts and obtains signatures on an MOA to enable the movement of data between their data source and the agency conducting the data match.
10. The approved organization drafts and executes a cost-sharing statement that articulates how it will share in the cost of maintaining and/or enhancing the system.
11. The approved organization designates representatives for the P20 WIN Executive Board, Data Governing Board and Data Steward Committee and provides names and contact information to the P20 WIN Program Manager.
12. The approved organization complies with the technical requirements for establishing a remote server if necessary.
13. The approved organization works with system administrators from the participating agencies to configure hardware, software and map data elements to the system if necessary.

10.5 Technical Requirements for Joining P20 WIN

In order for an agency or organization to participate in P20 WIN, the joining entity may need to meet technical requirements more detailed than those identified in this section. The P20 Program Manager will supply documentation if necessary. Basic requirements for approved data requests that require the participating organization's data include, but are not limited to the following:

1. The participating organization must be able to create data files for matching data that comply with the P20 WIN Data Request Procedure.
2. The participating organization must be able to create data files with data fields requested for audits and evaluations that comply with the P20 WIN Data Request Procedure.
3. The participating organization must be able to send and receive data files securely as required by memoranda of understanding for approved data requests.
4. The participating organization must be able to monitor and maintain the quality of its source system data.

10.6 Criteria for Inclusion

The P20 WIN Data Governing Board, Office of the Attorney General and P20 WIN Executive Board will consider each formal request for inclusion based upon criteria that include but are not limited to the following factors:

- The interested organization's participation is consistent with state and federal law..
- The interested organization's participation furthers legitimate public interests.
- The interested organization can contribute unit record data to P20 WIN which will further Participating Agencies' ability to conduct audits and evaluations of state- or federal-supported education programs.
- The interested organization is allowed to share unit record data through P20 WIN according to state and federal law.
- The interested organization has financial resources to support their share of the maintenance and operational costs for a minimum of 2 years.

10.7 Executive Approval

As members of the Executive Board for P20 WIN, we approve this procedure which becomes effective as of the later of the dates noted below.

10.7 Executive Approval

As members of the Executive Board for P20 WIN, we approve this procedure which becomes effective as of the later of the dates noted below.

Board of Regents for Higher Education:

Name: Dr. Gregory W. Gray
Title: President
Signature: [Signature]
Date Signed: 10/17/14

Connecticut State Department of Education:

Name: Stefan Pryor
Title: Commissioner
Signature: [Signature]
Date Signed: 11/5/14

Department of Labor:

Name: Dennis Murphy
Title: Deputy Commissioner
Signature: [Signature]
Date Signed: 1/20/15

Connecticut Independent College and University Institute for Research and Public Service

Name: Judith Greiman
Title: President
Signature: [Signature]
Date Signed: 11/10/14

This addendum to the Preschool through Twenty and Workforce Information Network (P20 WIN) Protocol to Expand P20 WIN demonstrates that the University of Connecticut adopts the principles of this Protocol as of the date of signature.

University of Connecticut

[Signature]
Dr. Sally Reis, Vice Provost for Academic Affairs

5/27/15
Date

11.0 PROCESS FOR ADDING DATA ELEMENTS

The addition of data elements to P20 WIN by Participating Agencies will enable more nuanced understanding of educational pathways and workforce outcomes. Therefore, participating agencies and organizations are encouraged to expand the number of data elements that are available to P20 WIN to the fullest extent possible. Because agencies retain ownership of their data repositories and only share data that is approved for a given data request, there is no size or space limitation within P20 WIN to the number of data sources, data tables, data fields or records that could be accessed for the purpose of linking data. What can be shared is only limited by the capacity of the participating agencies themselves. However, communication about expansion is important, so agencies should address the following steps:

- Inform P20 WIN Manager of plans for expansion
- Map new data elements to the Common Education Data Standards if appropriate
- Supply the data dictionary with meta-data for the new elements.
- Communicate with stakeholders regarding addition and value of new data.
- Modify agency data source to include the new fields

In instances where a new policy question generates the need for additional data elements not currently available, the Data Governing Board will determine whether impacted participating agencies should be asked to expand available data elements to accommodate the request. If the Data Governing Board and the agency impacted, determine that it would be valuable and it is feasible for the agency to include the additional fields, the agency will work with their respective Data Steward Committee members to make the necessary adjustments to the agency's data source. The process to follow would include the steps from above.

12.0 GLOSSARY

Term	Definition
Authorized Representative	An Authorized Representative is defined as specified in FERPA regulations, § 99.3. An Authorized Representative is any entity or individual designated by a State or local educational authority or an agency headed by an official to conduct, with respect to Federal or State supported education programs, any audit or evaluation, or any compliance or enforcement activity in connection with Federal legal requirements that relate to these programs. The Authorized Representative for each data request is designated in its corresponding Memorandum of Agreement between the agencies whose data is included in the request.
Data Definitions	Data Definitions are the plain language descriptions of data elements. The definitions should be specific enough to allow users to fully understand the data elements.
Data Elements	Data Elements are units of information as they are stored or accessed in any data system. For example, data elements about a student's academic history could include: student ID number, course code, credits attempted, cumulative grade point average, et cetera.
Data Field	The Term Data Field is used interchangeably with Data Element in this document.
Data Governance	Data Governance is both an organizational process and a structure that supports the process. It establishes responsibility for data management and security and supports the continuous improvement of data quality and utilization through the systemic creation and enforcement of roles, responsibilities and data governance policies and procedures.
Data Steward	A data steward is an individual who has some level of responsibility for an organization's data. Data stewards might be institutional researchers and information technology staff.
Data Request Management	The review process for each data request processed through the system. The Data Request Management process includes but is not limited to the following steps: <ul style="list-style-type: none"> – Document the purpose of the query as it pertains to conducting an audit/evaluation of education programs as allowed by FERPA – Designate which authorized individuals will initiate the query – Identify the specific data elements in each data set to be included in the query – Designate the individual(s) who have authority to access to the resulting data set – Document the plans for data analysis and reporting of data from the resultant data set – Obtain approval from each agency whose data is requested – Execute an MOA for the approved data request – Produce and link data files; Conduct analysis – Ensure that each agency whose data is included has an opportunity to review and provide feedback on any report that is to be made public prior to publication.
Education Program	An education program will be defined as specified in the FERPA regulations, §99.3. An education program includes programs that are principally engaged in the provision of education, including, but not limited to, early childhood education, elementary and secondary education, postsecondary education, special education, job training, career and technical education, and adult education, and any program that is directly administered by an educational agency or institution. For a definition of "early childhood program" please refer to §99.3 of the FERPA regulations.

Term	Definition
Federated Data System	In a Federated Data System, multiple sources of data are linked without creating a data warehouse. Suppliers of data retain ownership and control of their data source as is linked through software that uses record locators to track connections between separate data sets.
Hard Data	The term Hard Data refers to actual data in a data system. Each Hard Data point typically pertains to one fact, indicator or attribute about an individual or other entity in a repository. Examples of Hard Data about a fictitious person are: female, XYZ High School, 3.5 GPA.
Meta-Data	Meta-Data refers to the information about a data element that provide context for a data element such as its definition, storage location, format and size. For example, the data element ‘Gender’ might have the following associated meta-data: Table Name, Description, Code Set, format, etc.
Participating Agency	Participating Agency is an agency or organization that has an established data sharing agreement for participating in P20 WIN, contributes data through P20 WIN and abides by the provisions in the Data Governance Policy and Data Governance Manual.
Personally Identifiable Data	<p>Personally identifiable data from education records (PII) is information from education records that can be used to distinguish or trace an individual’s identity. Under FERPA [34 CFR § 99.3], PII includes but is not limited to:</p> <ul style="list-style-type: none"> – The student’s name – The name of the student’s parent or other family member – The address of the student or student’s family – A personal identifier, such as the student’s social security number, student number or biometric record – Other indirect identifiers, such as the student’s date of birth, place of birth, and mother’s maiden name. – Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty – Information requested by a person who the education agency reasonably believes knows the identity of the student to whom the education record relates.
P20 WIN	P20 WIN stands for Preschool through 20 and Workforce Information Network, where ‘P’ refers to prekindergarten, including early childhood and ‘20’ includes advanced and lifelong learning. The P20 WIN system will include information about individuals as they pass in and out of Connecticut educational systems and the Connecticut workforce.
Re-disclosure	Re-disclosure means transfer or disclosure of PII to any other person or entity whose access to PII is not specifically authorized in this Agreement.
Shared Data	Shared data are the data fields identified by each Participating Agency that is available through for linking with data from other Participating Agencies through the data request process. Participating Agencies typically share a subset of their operational data sets.

APPENDICES

Appendix A: P20 WIN Data Governance Participants

Executive Board Participants

Name	Title	Organization
David Wilkinson	Commissioner	Office of Early Childhood
Dr. Dianna Wentzell	Commissioner	State Department of Education
Mark Ojakian	President	Connecticut State Colleges & Universities
Scott Jackson	Commissioner	Department of Labor
Jennifer Widness	President	CT Conference of Independent Colleges
Dr. Lloyd Blanchard	Associate Vice Provost	University of Connecticut
Tyler Kleykamp	Chief Data Officer	Office of Policy and Management

Data Governance Board

Name	Title	Organization
Jennifer Johnson	Director Quality Improvement Division	Office of Early Childhood
Ajit Gopalakrishnan	Bureau Chief	State Department of Education
Dr. William Gammell	Director of Policy, Institutional Research and Strategic Planning	Connecticut State Colleges & Universities
Dr. Andrew Condon	Director of Research & Information	Department of Labor
Jennifer Widness	President	CT Conference of Independent Colleges
Dr. Lloyd Blanchard	Associate Vice Provost	University of Connecticut

Data Steward Committee

Name	Title	Organization
Julie Bisi	Data & Accountability Coordinator	Office of Early Childhood
Chuck Martie	Education Consultant	State Department of Education
Joe McAuliffe	Director of Business Info Systems	Connecticut State Colleges & Universities
Jan Kiehne	Institutional Research Specialist	Connecticut State Colleges & Universities
Dana Placzek	Research Analyst	Department of Labor
Liam McGucken	Senior System Developer	Department of Labor
Dan Sokol	Data Warehouse Administrator	University of Connecticut
Maura Provencher	Vice President of Research and Administration	CT Conference of Independent Colleges

Appendix B: P20 WIN Data Request Management Procedure

This procedure outlines a process for managing requests for data from the Preschool through 20 and Workforce Information Network (P20 WIN) as defined by the P20 WIN Project Leadership Team. This procedure is incorporated by reference and made a part of the Memorandum of Agreements between the participating agencies providing data to the P20 WIN and the Connecticut Department of Labor. It is expected that this process will be modified and improved based upon what is learned through experience, however all changes to this procedure must be approved by the aforementioned parties before becoming effective. The document is not repeated within this manual, but can be obtained by contacting the P20 WIN Manager on on-line at:

http://www.ct.edu/files/pdfs/P20WIN-DataRequestProcedure-Final_01202015.pdf

Appendix C: Revision History

Revision Date	Version	Description / Reason	Revised By	Approved By	Approval Date
09-21-15	V 4	1) Hotlinks updated if necessary 2) Revision History section added 3) Section 9.8 added: New and Departing Employees 4) Section 9.9 added: Conducting Analysis with Your Own Agency's Data 5) Sentence added to section 8.2 requiring data destruction within 24 hours after the match is complete for data sets containing CCIC data. 6) Table of Contents updated 7) P20 WIN Participants updated	Jan Kiehne		
06-20-16	V5	1) Change references to the Board of Regents to Connecticut State Colleges and Universities for consistency with templates 2) A few minor edits	Jan Kiehne		